

# EXHIBIT 11

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**By E-mail**

Sean Carter, Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103

April 13, 2016

**RE: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)**

Dear Sean,

I am writing to set forth a comprehensive list of Dubai Islamic Bank's ("DIB") discovery obligations as a consequence of Judge Maas' orders during the hearing on March 22, 2016 regarding your two motions to compel (Dkts. 2973 & 2974). *See* Tr. of Record, 03 MDL 1570 (Mar. 22, 2016) (hereinafter, "Tr.").

**1. 152 Taliban Related Names**

As ordered by Judge Maas (Tr. at 59), please find enclosed an unredacted version of DIB\_003467-003491, which contains 152 names of alleged "Individuals/entities belonging to/or associated with the Taliban." DIB\_003467. We are producing the unredacted document in .pdf format with the bates stamp range DIB\_003558 to DIB\_003582. We are producing it in response to Plaintiffs' First Set of Requests for Production of Documents to Defendant DIB.

**2. Additional Search Terms**

Pursuant to Judge Maas' order, you may provide us with a list of "not more than 500 names" that consists of the following four categories of names:

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- (1) “[t]he 261 ... search terms that were agreed upon by the plaintiffs and the defendants” that were included at Dkt. 3057, Ex. 4 at 3-9;
- (2) “the 152 alleged Taliban accounts” listed in the document that the Court ordered DIB to produce in unredacted form (attached hereto as DIB\_003558 to DIB\_003582);
- (3) “[t]he eight ... actual accounts found and produced to the plaintiff[s]” by DIB in its prior productions; and
- (4) “accounts ... that will relate to the embassy bombings.”

Tr. at 58, 51, 55.

The list attached to this letter as Appendix A is our attempt to compile the search terms for categories 1, 2, and 3 listed above, which Judge Maas referred to as the “421 or so accounts or names.” Tr. at 55. For category 3, we have tried to add the names for the eight accounts that DIB has already produced as they are spelled in your motion to compel and any aliases that you provided for those names in your motion. Dkt. 2973 at 5-11. In addition, we attempted to remove any duplicate names that existed on this list as a result of assembling search terms covering categories 1, 2, and 3. As a result, the total number of search terms in Appendix A is 422.

Judge Maas has allowed you to supplement this list up to “not more than 500 names” in total, including with names that fall into category 4. Tr. at 58. Please let us know if you have any additions, modifications, or alternative search terms to be added to this list of “not more than 500 names” to be searched.

We will then use this final list of “not more than 500 names” as search terms to be run against DIB’s legacy bank account database that tracked accounts during the period of 1992 through 2004. As we summarized to the Court at the hearing:

So, plaintiffs will provide us a list with 500 names, we will search it using the same methodology that we searched the 261 names, and if there are any accounts for any of those individuals, we will produce the first three items that I talked about out of four items that we have[:] account opening documentation, complete account statements, and any electronic transaction data that exists in our primary legacy account record keeping system.

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Tr. at 59. In short, DIB will “search for exact matches on the search term in the full name accountholder field in DIB’s electronic account record keeping system,” Dkt. 3057, Ex. 3 at 3-4, and produce the three types of documents set forth in the block quote above from January 1, 2002 “through 12/31/2004.” Tr. at 60.

DIB would like to move forward in complying with the Court’s March 22, 2016 orders regarding additional search terms. Accordingly, please provide us with a revised list of “not more than 500 names” to be searched by *April 29, 2016*.

**3. Electronic Transaction Records**

Consistent with Judge Maas’ orders, DIB will produce “any electronic transaction data that exists in our primary legacy account record keeping system” listed on account statements DIB has already produced to plaintiffs. Tr. at 59. In addition, DIB will produce the corresponding electronic transaction data for any additional account statements produced as a result of the additional search terms as set forth in the prior section.

**4. Paper Transaction Records**

Following DIB’s completion of the production of account statements and electronic transaction data, we are willing to meet and confer about the production of additional paper transaction records in a manner consistent with Judge Maas’ rulings on March 22, 2016 and our prior exchanges and correspondence on this topic. *See, e.g.*, Tr. at 57.

**5. Documents Related to the 1998 U.S. Embassy Bombings**

As required by the Court, DIB will search for documents regarding “investigations or other responses that the bank internally may have had in terms of checking whether it had troublesome accounts or relationships” as a result of the 1998 U.S. Embassy bombings in Kenya and Tanzania. Tr. at 63.

**6. Fatwa and Sharia Supervisory Board Related Documents**

Lastly, as ordered by Judge Maas, DIB will produce to plaintiffs “all Sharia Board members’ names and tenures” during the relevant time period. Dkt. 3057 at 18. Following plaintiffs’ review of that list, plaintiffs “may identify specific individuals who they have reason to believe, perhaps in their individual capacity have either individually or together with others, issued Fatwahs which are of interest.” Tr. at 61. After plaintiffs identify such individuals, DIB

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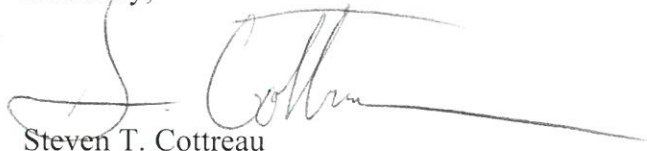
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will then search records within its possession, custody, or control for Fatwas that contain or are “related to violent pronouncements.” *Id.*

\* \* \*

In a manner consistent with the Court’s orders on March 22, 2016, plaintiffs’ requests for production, and DIB’s objections and responses to those requests (unless specifically overruled by the Court), DIB will make to plaintiffs a rolling production of the documents set forth in this letter.

Sincerely,



Steven T. Cottreau

Enclosure

cc: Alan Kabat



Appendix A

April 13, 2016

- 1 A. Kabir
- 2 A. Wahed Shafiq
- 3 Aafia Siddiqui
- 4 Abd al Aziz al Umari
- 5
- 6 Abderahman Mustafa
- 7 Abderrahmane Al Maghribi
- 8 Abdul Baqi
- 9 Abdul Baqi
- 10 Abdul Bari
- 11 Abdul Ghafar Qurishi
- 12 Abdul Ghafar Shenwary
- 13 Abdul Ghafoor
- 14 Abdul Haiy Aazem
- 15 Abdul Hakim Monib
- 16 Abdul Hakim Mujahid
- 17 Abdul Jabbar
- 18 Abdul Jalil
- 19 Abdul Kabir
- 20 Abdul Latif Mansur
- 21 Abdul Majid
- 22 Abdul Manan
- 23 Abdul Qadeer
- 24 Abdul Rahman Agha
- 25 Abdul Rahman Ahmad Hottak
- 26 Abdul Rahman Zahed
- 27 Abdul Raqib Takhari
- 28 Abdul Rauf
- 29 Abdul Razaq
- 30 Abdul Razaq
- 31 Abdul Salam Zaeef
- 32 Abdul Salam Zaeef
- 33 Abdul Salam Zaief
- 34 Abdul Samad Khaksar
- 35 Abdul Satar Paktis
- 36 Abdul Wahab
- 37 Abdul Wakil Mutawakil
- 38 Abdul Wasay Aghajan Motasem
- 39 Abdulaziz al Omari
- 40 Abdulhai Motmaen
- 41 Abdulhai Salek
- 42 Abdul-Haq Wasseq
- 43 Abdullah al Fak asi al Ghamdior
- 44 Abdullah al Fak'asi al Ghamdior

عبد العزيز العمري

- 45 Abdullah al Fakasi al Ghamdior
- 46 Abdullah al Fakasi al Ghamdior
- 47 Abdullah Murad
- 48 Abdulrahman Abdullah al Ghamdi
- 49 Abu Abdallah Abd Al Hakim
- 50 Abu Abdallah Abd AlHakim
- 51 أسامة محمد عوض بن لادن
- 52 Abu Abdallah Abd Al-Hakim
- 53 Abu al Hasan
- 54 Abu Amjed
- 55 Abu Anas
- 56 Abu Anas al Saudi
- 57 Abu Dhabi Banihammad Ahmed Fayez
- 58 فايز راشد احمد حسن القاضي بني حمث
- 59 Abu Fatima
- 60 Abu Hafs
- 61 Abu Hafs al Kabir
- 62 Abu Hafs al Masri
- 63 Abu Hammam
- 64 Abu Hassan al Madani
- 65 Abu Hassan al Sudani
- 66 Abu Horan
- 67 Abu Khadijah
- 68 Abu Khallifah al Omani
- 69 Abu Mahdi
- 70 Abu Rida al Sufi
- 71 Abu Rida the Syrian
- 72 Abu Ridha al Suri
- 73 Abu Sitta
- 74 Abu Ubaydah
- 75 Abu Yassir al Jaza iri
- 76 Abu Yassir al Jaza'iri
- 77 Abu Yassir al Jazairi
- 78 Abu Yassir al Jazáiri
- 79 Abu Yassir Sarrir
- 80 Addallah al Mihdhar
- 81 Ahmad al Haznawi
- 82 Ahmad bin Abdullah al Nami
- 83 أحمد بن عبد الله النامي
- 84 Ahmad Ibrahim al Haznawi
- 85 احمد ابراهيم الحزناوي
- 86 Ahmad Jan
- 87 Ahmad Salat Sa id al Ghamdi
- 88 Ahmad Salat Sa'id al Ghamdi

- 89 Ahmad Salat Said al Ghamdi
- 90 Ahmad Salat Sáid al Ghamdi
- 91 احمد صلاة سعيد الغامدي
- 92 Ahmed al Ghamdi
- 93 Ahmed al Nami
- 94 Ahmed bin Abdullah al Nami
- 95 Ahmed Ibrahim al Haznawi
- 96 Ahmed Jan Akhund
- 97 Ahmed Nur Ali Jumale
- 98 Ahmed Salah Said al Ghamdi
- 99 Akhtar Mohammad
- 100 Akhtar Mohammad Mansour
- 101 Al Barakaat Bank of Somalia
- 102 Al Barakah Exchange
- 103 Al Hijrah Construction and Development Ltd
- 104 Al Hijrah Construction and Development Ltd
- 105 Al Hijrah Construction and Development, Ltd.
- 106 al Mukh
- 107 خالد شيخ محمد
- 108 Al Qaqa
- 109 Al Qudarat Transport Company
- 110 Al Timar al Mubarikah
- 111 Ali Abdul Aziz Ali
- 112 Ali Haroun
- 113 Ali Salah Muhammad Kahlah al Marri
- 114 Alla Dad Tayeb
- 115 Aminullah Amin
- 116 Amir Khan Motaqi
- 117 Amir Khan Muttaqi
- 118 Ammar al Baluchi
- 119 Anwar al Aulaqi
- 120 Anwar al Awlaki
- 121 Anwar al Awlaqi
- 122 Anwar alAulaqi
- 123 Anwar al-Aulaqi
- 124 Anwar alAwlaki
- 125 Anwar al-Awlaki
- 126 Anwar alAwlaqi
- 127 Anwar al-Awlaqi
- 128 Anwar Nasser Abdulla Al Aulaqi
- 129 Anwar Nasser Abdulla AlAulaqi
- 130 Anwar Nasser Abdulla Al-Aulaqi
- 131 Anwar Nasser Abdulla Aulaqi
- 132 أنور ناصر عبدالله العولقي



- 133 Anwar Nasser Abdullah Aulaqi
- 134 Anwar Nasser Aulaqi
- 135 Arefullah Aref
- 136 Arsalan Rahmani
- 137 Ashraf Refaat Nabith Henin
- 138 Atiqullah
- 139 Attiqullah Akhund
- 140 Awad al Sayad
- 141 Awag al Sayyid Atta
- 142 Azizirahman
- 143 Banihammad Fayeze Abu Dhabi Banihammad
- 144 Baradar
- 145 Ben Laden Osama
- 146 Ben Laden Ossama
- 147 Ben Laden Usama
- 148 Bin Laden Osama Mohamed Awdh
- 149 Bin Laden Usamah Bin Muhammad
- 150 Bin Ladin International
- 151 Blessed Fruits Company
- 152 Dadullah Akhund
- 153 Djallalouddine Haqani
- 154 Dost Mohammad
- 155 Ehsanullah
- 156 Esmatullah Asem
- 157 Ezatullah
- 158 Fahd Bin Adballah bin Khalid
- 159 Fahrem Shahin
- 160 Faiz
- 161 Faiz Mohammad Faizan
- 162 Faiz Rashid Ahmad Hassan al Qadi
- 163 Fayaz Rashid Ahmad Hassan al Qadi Bani Hammad
- 164 Fayeze Ahmad
- 165 Fayeze Banihammad
- 166 Fayeze Rashid Ahmed
- 167 Fayeze Rashid Ahmed Hassan al Qadi Banihammad
- 168 Fazel M. Mazloom
- 169 Gul Ahmad Hakimi
- 170 Gum Arabic Company
- 171 Habibullah Fauzi
- 172 Habibullah Reshad
- 173 Hamdullah
- 174 Hamidullah
- 175 Hamidullah Nomani
- 176 Hamsudin

177	Hamza al Ghamdi	
178	Hamza Alghamdi	
179		حمزة الغامدي
180	Hani Fawaz TRDNG	
181		عمار البلوشية
182	Hani (Fawaz TRDNG)	
183	Hani Fawaz TRDNG	
184	Hani Hanjour	
185	Hani Saleh Hasan Hanjour	
186	Hani Salih Hasan Hanjur	
187		هاني صالح حسن حنjour
188	Hashem Abderahman	
189	Hashem Abdollahi	
190	Hashem Abdulrahman	
191	Hashim Abd al Rahman	
192	Hashim Abdourahman	
193	Hidayatullah Abu Turab	
194	Isam Mansar	
195	Isam Mansour	
196	Isam Mansur	
197	Jalaluddine Shinwari	
198	Jan Mohmmad Madani	
199	Janan	
200	Khair Mohammad Khairkhwah	
201	Khalid Adbul Wadood	
202	Khalid al Mihdhar	
203	Khalid bin Muhammad	
204	Khalid Mohammad al Saqaf	
205	Khalid Muhammad Abdallah al Mihdhar	
206		خالد المحضار
207	Khalid Shaikh Mohammed	
208	Khalid Sheikh Mohammed	
209	Khallad bin Attash	
210	M. Ahmadi	
211	M. Eshaq	
212	M. Hasan Rahmani	
213	M. Ibrahim Omari	
214	M. Jawaz Waziri	
215	M. Musa Hottak	
216	M. Rasul	
217	M. Shafiq	
218	Majad Masha an Muqad	
219		ماجد مشعان موقد
220	Majed Mashaan Ghanem Moqed	

- 221 Majed Moqed
- 222 Majid Moqid Mushan bin Ghanim
- 223 Manan Nyazi
- 224 Marwan al Shehhi
- 225 Marwan Yousef Mohamed Rashid Lekrab al Shehhi
- 226 Marwan Yusuf Muhammad Rashid Lekrab ash Shehhi
- 227 مروان يوسف محمد رشيد لكراب الشحي
- 228 Matiullah
- 229 Meer Akram
- 230 Mehan Atta
- 231 Mohald al Shehri
- 232 مهند الشهري
- 233 Mohamed Abbattay
- 234 Mohamed Atta
- 235 Mohamed el Amir
- 236 محمد محمد الأمير عوض السيد عطا
- 237 Mohamed el Amir Awad el Sayed Atta
- 238 Mohamed el Sayed
- 239 Mohamed Elsayed
- 240 Mohamed Loay Bayazid
- 241 Mohamed Mohamed el Amir Awad el Sayed Atta
- 242 Mohammad Abbas Akhund
- 243 Mohammad Aleem Noorani
- 244 Mohammad Azam Elmi
- 245 Mohammad Daud
- 246 Mohammad el Amir
- 247 Mohammad Essa Akhund
- 248 Mohammad Hassan
- 249 Mohammad Homayoon
- 250 Mohammad Naim
- 251 Mohammad Nasim Hanafi
- 252 Mohammad Rabbani
- 253 Mohammad Saddiq
- 254 Mohammad Salim Haqqani
- 255 Mohammad Sarwar Siddiqmal
- 256 Mohammad Sediq Akhundzada
- 257 Mohammad Sharif
- 258 Mohammad Sohail Shaheen
- 259 Mohammad Tahre Anwari
- 260 Mohammad Wali
- 261 Mohammad Yaqoub
- 262 Mohammad Zahid
- 263 Mohammadullah Mati

- 264 Mohammed al Shehhi  
 265 Mohammed Atef  
 266 ابو حفص المصري  
 267 Mohammed Loay Baizid  
 268 Mohammed Omar  
 269 Mohammed Yassir al Masri  
 270 Mohand al Shehri  
 271 Mohand Mohammed Fayiz al Shehri  
 272 Moslim Haqqani  
 273 Mounir el Motassadeq  
 274 Mounir el Moutassadeq  
 275 منير المتصدق  
 276 Muhammad Adnan  
 277 Muhammad Ahanad  
 278 Muhammad al Amir  
 279 Muhammad Atta  
 280 Muhammad Islam  
 281 Muhammad Muhammad al Amir Awad as Sayyid Atta  
  
 282 Muhand ash Shehr  
 283 Mukhtar al Baluchi  
 284 Mustafa Ahmed  
 285 مصطفى الهوساوي  
 286 Mustafa Ahmed al Hawsawi  
 287 Mustafa Ahmed al Hisawi  
 288 Mustafa Ahmed Muhammad Uthman Abu al Yazid  
 289 Mustafa Muhammed Ahmed  
 290 Mustasaed  
 291 Najibullah  
 292 Najibullah Haqqani  
 293 Nawaf al Hamzi  
 294 Nawaf al Hazmi  
 295 نواف الحازمي  
 296 Nawaf Muhammed Salim al Hazmi  
 297 Nazar Mohammad  
 298 Nazirullah Anafi  
 299 Nik Mohammad  
 300 Noor Jalal  
 301 Noor Mohammad Saqib  
 302 Nooruddin Turabi  
 303 Nurullah Nuri  
 304 Osama Bin Laden  
 305 Osama bin Ladin  
 306 Osama bin Muhammad bin Awad bin Ladin

- 307 Qalamuddin  
 308 Qalamudin Momand  
 309 Qari Abdul Wali  
 310 Qari Ahmadulla  
 311 Qari Din Mohammad  
 312 Qari Din Mohammad Hanif  
 313 Qudratullah Jamal  
 314 Rahamatullah Kakazada  
 315 Rahimullah Zurmati  
 316 Rahmatullah Safi  
 317 Ramatullah Wahidyar  
 318 Ramzi Bin Al Shibh  
 319 Ramzi Mohamed Abdullah Binalsheidah  
 320 Ramzi Mohammed Abdellah Omar  
 321 رمزي بن الشيبه  
 322 Ramzi Mohammed Abdullah Binalshibh  
 323 Rasid Ahmed Hassen Alqadi  
 324 Rostam Nuristani  
 325 S. Ahmed Shahidkhel  
 326 Sa id al Ghamdi  
 327 Sa'id al Ghamdi  
 328 Sadruddin  
 329 Sadudin Sayed  
 330 Saed M. Azim Agha  
 331 Saeed Abdallah Ali Sulayman al Ghamdi  
 332 Saeed Ahmad Lootah  
 333 Saeed al Ghamdi  
 334 Saeed al Masri  
 335 Said al Ghamdi  
 336 Sáid al Ghamdi  
 337 سعيد الغامدي  
 338 Said Bahaji  
 339 سعيد باهاج  
 340 Said Madani Al Tayyib  
 341 Saiduddine Sayyed  
 342 Salam al Hazmi  
 343 سالم الحازمي  
 344 Saleh Saeed Mohammed bin Yousaf  
 345 Salem al Hamzi  
 346 Salem al Hazmi  
 347 Salem Ali  
 348 Samiullah Muazen  
 349 Sanani

- 350 Sannan al Makki
- 351 Satam al Suqami
- 352 Satam as Suqami
- 353 سطات السقامي
- 354 Satam Muhammed Abdel Rahman al Suqami
- 355 Sayed Esmatullah Asem
- 356 Sayeedur Rahman Haqani
- 357 Sayyed Ghiassouddine Agha
- 358 Sayyed Haqqan
- 359 Shafiqullah Mohammadi
- 360 Shahabuddin Delawar
- 361 Shams Ur-Rahman
- 362 Shamsalah Kmalzada
- 363 Shams-Us-Safa Aminzai
- 364 Sharif al Din Ali Mukhtar
- 365 Shaykh Sa id
- 366 Shaykh Sa'id
- 367 Shaykh Said
- 368 Shaykh Sáid
- 369 Shaykh Usama Bin Ladin
- 370 Sheikh Said al Masri
- 371 Sheikh Taysir Abdullah
- 372 Sher Abbas Stanekzai
- 373 Syed Allamuddin
- 374 Taba Investment Company Ltd
- 375 Taba Investment Company Ltd
- 376 Taba Investment Company, Ltd.
- 377 Tahis
- 378 Tawana
- 379 Tawfiq Muhammad Salih bin Rashid
- 380 Ubaidullah Akhund
- 381 Umar Muhammad Abdallah Ba Amar
- 382 Usama Bin Laden
- 383 Usama bin Ladin
- 384 Usama bin Muhammad bin Awad bin Ladin
- 385 Usama Bin Muhammed Bin Awad
- 386 Usama Muhammed Awad Bin Laden
- 387 Usamah Bin Muhammad Bin Ladin
- 388 Wa el Hamza Jelaidan
- 389 Wa'el Hamza Jelaidan
- 390 Wadi al Aqiq Company Ltd
- 391 Wadi al Aqiq Company Ltd
- 392 Wadi al Aqiq Company, Ltd.
- 393 Wael Hamza Jelaidan



- 394 Wáel Hamza Jelaidan  
 395 Wail al Shehri  
 396 Wail ash Shehri  
 397 وائل الشهري  
 398 Wail Mohammed al Shehri  
 399 Waleed al Shehri  
 400 Waleed Mohammed al Shehri  
 401 Walid ash Shehri  
 402 وليد الشهري  
 403 Walid Bin Attash  
 404 Walid Muhammad Salih bin Attash  
 405 Walid Muhammad Salih bin Roshayed bin Attash  
 406 وليد محمد صالح بن رشيد بن عطاش  
 407 Walijan  
 408 Yar Mohammad Rahimi  
 409 Zabihullah Hamidi  
 410 Zakariya Essabar  
 411 زكريا الصبار  
  
 412 Zakarya Essabar  
 413 Ziad Jarrah  
 414 Ziad Jarrah Jarrat  
 415 Ziad Jarrahi  
 416 Ziad Samir al Jarrah  
 417 Ziad Samir Jarrah  
 418 Zia-Ur-Rahman Madani  
 419 Ziyad Samir Garrah  
 420 Ziyad Samir Jarrah  
 421 زياد سمير جراح  
 422 Zouheir Al Maghribi